## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO CASE NO.: 18-CR-00746(PAD)

UNITED STATES OF AMERICA, *Plaintiff*,

Vs.

CESAR EMILIO PERALTA-ADAMEZ,

Defendant.

## **MOTION TO RESTRICT**

TO THE HONORABLE COURT:

Comes now defendant Cesar Emilio Peralta Adamez, by and through the undersigned attorney, and respectfully requests leave to file a document under restricted access pursuant to Standing Order 9, dated January 13, 2013, and signed by the Honorable Aida M. Delgado-Colon, Chief US District Judge, because the same contains sensitive and personal information. The Defendant herein has filed a motion in DE#72 on August 9, 2023, for which he respectfully requests restricted access. Disclosure of the information contained therein could reveal protected and sensitive information about the Defendant and his family, who currently reside in the Dominican Republic, and disclosure could place their health and/or safety at risk. Good cause exists to restrict this motion to parties only, and the requested restriction is supported by clear and compelling reasons, and it is narrowly tailored to serve those reasons.

Therefore, for reasons apparent from the document, the undersigned counsel believes that such interest outweighs the need for public access. Due to the sensitive nature of the information detailed herein, the defendant will file this pleading as Selected Parties Only to protect the

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confidentiality of the matters detailed herein. The protection of the information detailed herein outweighs the presumption of public access.

WHEREFORE, the Defendant respectfully requests for this Honorable Court to GRANT the remedy requested this court for the entry of an Order to Restrict the Motion at DE#72 to Parties Only.

Respectfully submitted,

\_/s/Michael R. Hasse

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 10, 2023 a copy of the foregoing Motion to Seal on behalf of the defendant, Cesar Peralta, was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's Electronic Filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF Filing System.

s/ Michael R. Hasse

Michael R. Hasse, USDCPR# 215307